

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

RICHARD C. CHENG (CABN 135992)
Assistant United States Attorney

GRANT P. FONDO (CABN 181530)
Assistant United States Attorney
150 Almaden Boulevard, Suite 900
San Jose, CA 95113
Telephone: (408) 535-5061
Fax: (408) 535-5066
E-Mail: richard.cheng@usdoj.gov
grant.fondo@usdoj.gov

6/07/12 Page 1 of 3

IT IS SO ORDERED
AS MODIFIED

James Ware
Judge James Ware

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,) No. 08-00938 JW
Plaintiff,) PARTIES' STIPULATION TO
v.) RESCHEDULE JUNE 11, 2012, STATUS
JAMIE HARMON,) CONFERENCE TO OCTOBER 25, 2012;
Defendant.) [PROPOSED] ORDER

The United States of America and defendant Jamie Harmon, by and through their undersigned counsel, hereby submit this joint request to move the parties' status conference, currently scheduled for Monday, June 11, 2012, at 1:30 p.m. to October 25, 2012.

PARTIES JOINT STATEMENT AND STIPULATION

On September 23, 2011, the United States filed a Notice of Appeal of this Court's order to overturn the jury's conviction of the defendant for five counts of laundering monetary instruments.

On December 1, 2011, the United States filed a request for extension to file its opening brief to January 17, 2012, because the United States was in the process of obtaining the requisite authorization from the Office of the Solicitor General for the filing of the appeal. On December 1, 2011, the Ninth Circuit Court of Appeals granted the United States' motion.

On Friday, January 17, 2012, the United States filed its opening brief. Subsequently, appellant has filed two requests for extensions to file its answering brief, both of which were granted. Appellant's opening brief is currently due later this month, and the United State's reply brief 14 days thereafter.

9 Therefore, the parties request the parties' June 11, 2012, status conference be rescheduled to
10 October 25, 2012.

11 The parties agree that any period of delay resulting from this appeal shall be excluded in
12 computing the time within which trial in this matter must commence, pursuant to Title 18 U.S.C.
13 § 3161(h)(1)(C).

14

16 MELINDA HAAG
United States Attorney

/S/

GRANT P. FONDO
Assistant United States Attorney

21 | DATED: June 6, 2012
Respectfully submitted,

22 || /SA

EDWARD SWANSON, ESQ
Counsel for Defendant

25

36

37

20

1 || [PROPOSED] ORDER

3 Based upon the representation of counsel and for good cause shown, the parties' status
15
4 conference scheduled for June 11, 2012, at 1:30 p.m. is reschedule for October 25, 2012.

5 The Court further finds that any period of delay resulting from this interlocutory appeal shall be
6 excluded in computing the time within which trial in this matter must commence, pursuant to
7 Title 18 U.S.C. § 3161(h)(1)(C).

8 || IT IS ORDERED

DATED: June 7, 2012


JAMES WARE
United States District Judge